

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143

The Honorable Judge Ellis

Next Hearing Date: None Scheduled

**MOTION FOR LEAVE TO FILE RESPONSE TO GOVERNMENT’S SUPPLEMENTAL
BRIEF ON DEFENDANT’S MOTION TO COMPEL DISCOVERY**

Zackary Ellis Sanders, by and through undersigned counsel, respectfully submits this Motion for Leave to File a Response to the Government’s Supplemental Brief in order for the Court to rule on a clear record based on the additional information the Government has now set forth. Pursuant to Local Criminal Rule 47, Mr. Sanders moves for this Court’s Leave to file the attached Response given that the Government has incorrectly represented one issue and added additional information on another. Both issues are important as to whether this Court should order the Government to disclose additional discovery to which Mr. Sanders is entitled.

Based on the foregoing, and Mr. Sanders’s rights under the Sixth Amendment and due process, the defense respectfully requests that this Court grant leave for the Mr. Sanders to file the attached Response in this case.

Respectfully submitted,

/s/ Jonathan Jeffress

Jonathan Jeffress (#42884)

Emily Voshell (#92997)

Jade Chong-Smith (admitted *pro hac vice*)

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Counsel for Defendant Zackary Ellis Sanders

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of August, 2020, the foregoing was served electronically on the counsel of record through the U.S. District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Emily Voshell
Emily Voshell